

Comments from Tom Tunnicliff
British Petroleum
Revisions in MRBCA Technical Guidance
September 28, 2005
Received via telephone conversation

With respect to the USEPA comments, Tom stated that the development of MRBCA has been a consensus building process. He had hoped that the stakeholders could be involved in building consensus with the USEPA along the way rather than being put in the position of just responding to their comments. He thought it would be more productive and less cumbersome if the state and federal government and stakeholders had been building changes together rather than government meeting separately. He stated that he hoped that future meetings would include everyone, and asked that he be informed of any such meetings.

With respect to the proposed revised inhalation rate for a construction worker, Tom stated that he believed that a more reasonable scenario would be the following:

In a 10-hour workday,

- 2 hours per day at a slow activity rate

- 6 hours per day at a medium rate

- 2 hours per day at a fast rate.

Tom also stated that the Exposure Frequency for a Construction Worker, currently at 90 days per year, should be more like 45-60 days per year. Tom said that he based his comments on his redevelopment experience on British Petroleum sites and his construction experience in the field.

Response to Comments from Tom Tunnicliff
British Petroleum
Revisions in MRBCA Technical Guidance
November 29, 2005

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DNR Response: The department has scheduled a meeting for January 12, 2005. The USEPA comments will be part of the agenda. The USEPA staff has informed the department that the USEPA will try to have representatives at that meeting.

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DNR Response: We agree that the activity scenario that you proposed is reasonable. We have calculated that it results in an hourly inhalation rate of 1.62 m³/hr and a daily rate of 1.62 m³/day.

In an effort to provide better information, the department looked at other states and what was used for a construction worker exposure value. A list of this information is attached. An Exposure Frequency for a Construction Worker of 45-60 days per year may also be appropriate for redevelopment on a Tanks site.